U.S. BANKRUPTCY COURT WESTERN DISTRICT OF VIRGINIA

IN RE: Walter Russell Winfree, III,

Chapter 13 Case No.24-50395

Debtor.

MOTION TO EXTEND DEADLINE TO FILE DEBTOR'S BALANCE OF SCHEDULES, PLAN AND OTHER DELIVERABLES

Debtor, by counsel, hereby requests that the Court extend the deadline to file his balance of schedules, plan and other deliverables as specified in ECF Docket #6), and as grounds state as follows:

- 1. Debtor filed this Chapter 13 to stop a foreclosure on his home.
- 2. Debtor scheduled an appointment with Counsel for July 30,2024 to finalize and sign his balance of schedules, plan, and other deliverables.
- 3. Debtor was unable to attend the meeting due to his mental and physical state. (Debtor suffers from a severe mental health disorder.)
- 4. Counsel was unable to reschedule an appointment with Debtor prior to the deadline on 8/1/2024.
- 5. Counsel and Debtor have scheduled an appointment on August 8, 2024 at 2:30 p.m. to sign the balance of schedules, plan, and other deliverables.
- 6. Debtor's Creditor Meeting is scheduled for September 3, 2024.

Wherefore, Debtor, by counsel, hereby requests that the Court extend the deadline to file his balance of schedules, plan, and other deliverables until August 9, 2024.

Dated: 8/1/2024

Respectfully submitted,

Walter Russell Winfree, III

By Counsel

/s/ Marshall M. Slayton Marshall M. Slayton Slayton Law, PLC 913 East Jefferson Street Charlottesville, VA 22902 Phone: (434) 979-7900 Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion was sent via first-class mail, postage prepaid to the Debtor and via ECF to the Trustee on 8/1/2024.

/s/ Marshall M. Slayton Marshall M. Slayton